



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

939 16TH STREET - SUITE 500

DENVER, CO 80202-2466

<http://www.epa.gov/region08>

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September 9, 2003

Mr. Robert Marriam
6401 Poplar Avenue, Suite 301
Memphis, TN 38119-4840

Dear Bob:

EPA has reviewed the draft documents you submitted regarding cleanup of the Flyway property in Libby, Montana. We appreciate your quick response. We have only a few comments.

1. The work plan does not reference information from the 2nd Addendum to the original Response Action Work Plan for the Flyway. I provided a copy of both the 1st and 2nd Addendums to you with the SAPs and other information I recently mailed. I also provided a copy of the 1st Addendum along with the original Work Plan when we met in Libby several months back. Both Addendums and the Work Plan were also included with the AOC.

The 2nd Addendum most accurately reflects current conditions and information available. The figures included in the 2nd Addendum, specifically Figure A2-2 showing grids requiring cleanup, supersede those found in the 1st Addendum and original Work Plan. The changes and rationale are explained in the 2nd Addendum. This is important because the area requiring cleanup, as shown in Figure A2-2 of the 2nd Addendum, is somewhat different than the area discussed in Section 3.2.5 of your work plan (which specifies approximately 28 grids to be excavated, which is based on the 1st Addendum dated May 10, 2002) but is substantially different than the grids shown in Figure 3-1 of Appendix C of your work plan (which was taken from the original Flyway work plan dated August 14, 2001).

I realize that the 2nd Addendum arrived somewhat late in the planning process for the AOC and that I stated to you in several conversations that I did not expect it to substantially change the scope of work. I apologize for the confusion. However, the 1st Addendum clearly showed 28 full grids still requiring excavation and this was what I assumed Grace was working off during our conversations prior to development of the 2nd Addendum, not the original EPA work plan. Section 3 of your work plan reflects this total. When the 2nd Addendum was developed, the number of grids increased to 53 from 28, which was somewhat of a surprise to me. However, this change is deceiving because (1) it includes five grids that are not owned by KDC and (2) counts partial grids as full grids, which affected a number of partial grids along the river bank and Parker/Wise property boundaries. In actuality, the only substantial changes in terms of area



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from the 1st Addendum to the 2nd Addendum were (1) the addition of five grids on the southern portion of the property and (2) the addition of the equivalent of about six full grids in the northwestern corner of the property. We discussed these areas at our meeting yesterday and I am hopeful we can reach resolution on a revised work plan.

2. At the screening plant, when contamination was left at depth, we used a geotextile fabric to mark the area prior to backfilling. In this way, if the area is excavated in the future, it is clear that contaminated soil is being disturbed. I would recommend this for any areas where clearance samples are not non-detect at the maximum depth of excavation. Hopefully, given the history of the property, this will be rare if it occurs at all. This is a good compromise between excavating everything and leaving contamination in place with no controls.

3. Section 3.2.5. When clearance/confirmation samples are taken, results *greater than or equal to 1%* require further excavation, as opposed to only those greater than 1%. I realize the text of the original EPA Flyway work plan is confusing in this regard, but the standard we currently apply is $\geq 1\%$. Similarly, if visual observations show significant source material, additional excavation may be required before confirmation samples are taken.

4. Section 3.2.11. Please provide details regarding decontamination of the pump house and any clearance criteria for structures left in place.

5. Appendix A, Table A-5. Equipment decontamination should take place in the contaminant reduction zone and in Level C.

6. Appendix A, Section 6.2, 2nd paragraph. Please define sampling frequencies for each of the tasks. Will each task be sampled daily or will sampling be rotated between tasks?

7. Appendix A, Table A-6. Please include excursion (30 minute) personal air monitoring samples in addition to TWA samples.

8. Appendix A, Section 8.1, 2nd paragraph and Section 8.3, 1st paragraph. Please change plastic trash bags to 6-mil clear asbestos disposal bags.

9. Appendix A. If workers will be working in close proximity to the river, an additional water safety section should be included, which would address tie-offs, life jackets, etc.

10. Appendix D. Section 11. Please provide completed text for this section (high wind conditions).

11. Appendix E. Additional erosion control measures may be necessary during excavation of the Kootenai River bank.

12. Appendix F. An exterior and interior decontamination of any equipment used in the exclusion zone is required prior to non-Level C activities.

With the exception of Number 1, these comments are fairly minor and should be easy to address. Our field staff in Libby or myself will be glad to assist you and provide any guidance. Our chemist is currently reviewing Appendices B and C. I will provide comments on these sections in separate letter within a few days. I would also like to coordinate and discuss use of the amphitheater and the mine road late in this year and early next year to ensure we are both using resources for soil disposal in the most efficient way. If you have any questions, please call me at (303) 312-6748.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Christiansen', with a stylized, flowing script.

Jim Christiansen
Remedial Project Manager

cc:

Matt Cohn, 8ENF-L
Courtney Zamora, U.S. DOT
Alan Stringer, W.R. Grace (hand carried)